

"Chamberlin, David" <ChamberlinDC@cdm.com> 04/15/2005 03:36 PM To Christopher Lichens/R9/USEPA/US@EPA

cc Chuck McLaughlin <cmclaugh@demaximis.com>, tperina@ch2m.com, "Wallin, Sharon" <WallinSL@cdm.com> bcc

Subject RE: EE/CA Remedial Action Objectives

History:

This message has been forwarded.

Chris - thanks for the very timely response! The issue of mass removal was discussed at length during the negotiation of the CD and accompanying SOW. The concluding agreement between OPOG and EPA was that, because containment is the primary objective of the EE/CA action and mass removal was more of a "secondary benefit", mass removal did not need to included as a Performance Standard. However, mass removal was included in the SOW in recognition that the containment action would necessarily include the removal of VOCs.

For these reasons, we did not include mass removal as an RAO - we see it as a "benefit" rather than an "objective".

We'd be glad to discuss this further with you, perhaps in next Wednesday's meeting.

Dave

----Original Message----

From: Lichens.Christopher@epamail.epa.gov [mailto:Lichens.Christopher@epamail.epa.gov]

Sent: Friday, April 15, 2005 11:11 AM

To: Chamberlin, David

Cc: Chuck McLaughlin; tperina@ch2m.com; Wallin, Sharon

Subject: Re: EE/CA Remedial Action Objectives

Chuck, Dave, and Sharon,

These look good. However, another objective addressing mass removal should be added, which is also consistent with the language in the Consent Decree. On a separate subject, we expect to provide comments on the On-Site Soils Work Plan Addendum and SSD Work Plan Monday. I'm in all day today if you want to talk further.

Chris

"Chamberlin, David" <ChamberlinDC@cd m.com>

04/12/2005 03:11 PM Christopher Lichens/R9/USEPA/US@EPA, tperina@ch2m.com

Chuck McLaughlin <cmclaugh@demaximis.com>, "Wallin, Sharon" <WallinSL@cdm.com>

Subject

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Chris (and Tom) - OPOG proposes the following RAOs, to be included in our EE/CA Report due to you on April 29:

- 1. Provide horizontal and vertical containment within the Phase 1a Area of groundwater contamination derived from the Omega property.
- 2. Meet air emission and water treatment standards associated with the treatment and/or reuse of extracted groundwater.

Chris, per my e-mail to you on Friday, we've crafted these two RAOs to match, as closely as possible, the Performance Criteria (PCs) as defined on Page 7 of the Consent Decree. RAO #1 above matches PC (i), and RAO #2 combines PC (ii) and (iii).

We certainly welcome your comments, either prior to or during our meeting with you next Wednesday.

Dave